BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D. C. 20268-0001

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OFFICE OF THE SECRETARY

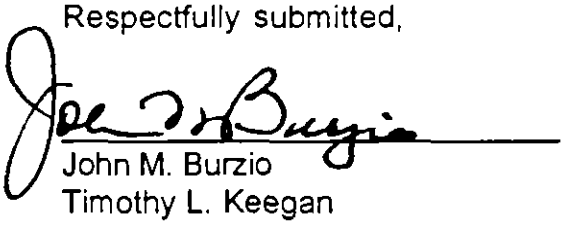
POSTAL RATE & FEE CHANGES, 1997

Docket No. R97-1

INTERROGATORIES OF TIME WARNER INC.
TO UNITED STATES POSTAL SERVICE WITNESS MODEN: TW/USPS-T4-26-28
(September 15, 1997)

Pursuant to sections 25 and 26 of the Rules of Practice, Time Warner Inc. (Time Warner) directs the following interrogatories to United States Postal Service witness Moden (USPS-T-4). If witness Moden is unable to respond to any interrogatory, we request that a response be provided by an appropriate person capable of providing an answer.

Respectfully submitted,



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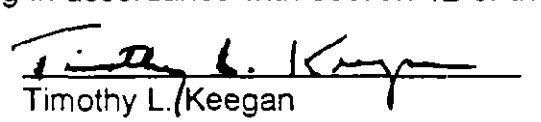
CERTIFICATE OF SERVICE

I hereby certify that I have this day served the instant document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Timothy L. Keegan

September 15, 1997

FIFTH SET OF INTERROGATORIES TO WITNESSMODEN (USPS-T-4)

TW/USPS-T4-26 Please refer to your answer to TW/USPS-T4-7h. In that interrogatory you were asked to identify all computerized tools used by postal facility managers to staff and schedule their mail processing operations. You identified only one such tool, namely the Site META program, for which a User's Manual was provided as Library Reference H-221 under protective conditions.

Please refer also to Library Reference H-255, which describes a 1991 study in which the contractor evaluated various USPS models and concluded (on page 2-1) that: "Two of the models examined dealt specifically with staffing and scheduling issues; The Annual Staffing and Resource Management Simulator (ASRMS) and the Post Office Scheduler (POSKED)."

a. Are you familiar with (1) the ASRMS; and (2) the POSKED programs?

b. Why did you omit references to both of these programs in your response to TW/USPS-T4-7h?

c. In your opinion, is the Site META program a more suitable tool for staffing and scheduling of mail processing in today's environment than the ASRMS and POSKED programs? Please explain your answer.

d. Based on your experience, to what extent are the ASRMS and POSKED programs being utilized for staffing and scheduling of mail processing activities today? If they are not used today, or are being used less than in the past, please explain

e. According to LR-H-255, at page 2-2, POSKED can be run in three modes. To the extent POSKED is still used in postal facilities, in which mode is it normally run?

f. Does a written manual for POSKED exist? If yes, please provide a copy.

g. Does a written manual for ASRMS exist? If yes, please provide a copy.

TW/USPS-T4-27 Please consider the following hypothetical. A manual flat sorting operation (e.g. 060) in a mail processing facility is staffed by 10 clerks. Assume that experience in that facility is that the average productivity during a tour is 400 flats per manhour. At a certain point, 3,000 flats are available for processing and the next batch, based on normal mail arrival patterns is expected in one hour. During that hour, the clerks sort the 3,000 flats, so as to be ready for additional mail when it arrives. At a certain later point, one hour before the first critical dispatch, there are 5,000 flats, which therefore need to be processed

within the next hour, and the supervisor urges the clerks to make an extra effort during that hour so as to not miss service commitments.

a. Based on your experience, is it not likely that the clerks during that "surge" period, given the urgency and the fairly light workload earlier in the tour, will make an extra effort and achieve a somewhat higher productivity than the average for the whole tour (e.g. more than 400 flats per manhour)? If no, please explain.

b. In your experience, are mail processing clerks, during a short "surge" period before a critical dispatch, capable of working at a faster pace than they would be able to sustain over a full eight hour tour?

c. Given that, according to the IOCS data presented by witness Degen, clerks at manual flats cases spend an average of 17.1%, or an hour and 22 minutes out of an eight hour workday, on "breaks personal needs", would you agree that there must be periods during an average tour when the workload at flat cases is fairly light? If you do not agree, then please explain why mail processing supervisors allow so much time to be spent on "breaks personal needs".

TW/USPS-T4-28

a. How do you explain the fact that, according to IOCS data, the percent of time that employees spend on "breaks personal needs" in mail processing facilities is much higher today than it was ten years ago?

b. According to the IOCS data presented by witness Degen, the percentage of employee time spent on "breaks personal needs", as well as the percent of time spent "clocking in or out", is higher at manual operations such at opening/pouching units and manual flats cases than at highly automated operations such as OCR and BCR. Is there anything in your experience that might explain this phenomenon? If yes, please explain.